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<sup>1</sup> NEW YORK ADMISSION PENDING

March 3, 2020

**By ECF**

Hon. Paul G. Gardephe  
Southern District of New York  
40 Foley Square, Room 2204  
New York, New York 10007

Re: *Jeniece Ilkowitz, et al. v. Michael Durand, et al.*  
Case No. 1:17-cv-00773-PGG-OTW

Dear Judge Gardephe:

This firm represents Defendant The Judicial Title Insurance Agency LLC ("Judicial Title"), in the above-referenced action. We write respectfully in accordance with Sections I(A) and IV(H) of your Individual Rules of Practice in Civil Cases to call to the Court's attention the fact that the Court has not yet decided the appropriate amount of a sanctions award in favor of Judicial Title.

In its Memorandum Opinion & Order dated March 27, 2018 (ECF Doc. No. 113), the Court, *inter alia*, granted Judicial Title's motion for Rule 11 sanctions against Plaintiffs' counsel, and directed Judicial Title to make its submission as to the appropriate amount of a sanctions award by April 5, 2018. Judicial Title made its submissions on April 5, 2018 (ECF Doc. Nos. 114 and 115). Plaintiffs' counsel submitted opposition to Judicial Title's fee application on April 20, 2018 (ECF Doc. No. 119). With leave of court, Judicial Title submitted a reply declaration in support of its fee application on May 2, 2018 (ECF Doc. No. 123). This matter has not yet been decided or settled.

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Southern District of New York  
March 3, 2020  
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We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, reading "Scott J. Pashman". The signature is written in a cursive, flowing style.

Scott J. Pashman

cc: All counsel of record by ECF  
Jean Claude Mazzola, Esq. by e-mail and mail

**CERTIFICATE OF SERVICE**

Scott J. Pashman, an attorney admitted to practice before this Court, certifies that I served the annexed Notice of Change of Law Firm Name, on the date hereof upon the counsel of record for all parties through ECF, and upon the following persons by e-mail and first class mail, postage prepaid, addressed as follows:

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Dated: New York, New York  
March 3, 2020

  
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